

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
Southern Division**

GEORGE HARRISON
2814 31st Avenue
Temple Hills, Maryland 20748

Plaintiff

v.

MATTHEW D. BEAUCAGE
93 Perry Road
Hartford, Maine 04220

and

JONATHAN PHIPPS
CONCOR NETWORKS
3000 Lakeside Drive Second Floor
Bannockburn, Illinois 60015

Defendants

Civil Docket No.

TDC 22CV0055

COMPLAINT

Plaintiff, George Harrison, by and through undersigned counsel, respectfully requests the court grant relief on his behalf and against defendants Matthew Beaucage and Concor Networks as further delineated herein. In support of this request, Plaintiff states as follows:

PARTIES

1. Plaintiff is a resident of the state of Maryland and at all operative times was operating a vehicle on the Baltimore Washington Parkway Interstate 295 a federal highway located in the state of Maryland, where this incident occurred.

2. Defendant Beaucage is a resident of the state of Maine and at all operative times was operating a vehicle on the Baltimore Washington Parkway Interstate 295 in the state of Maryland.
3. Defendant Johnathan Phipps is an employee of defendant Concor Networks a company located in Illinois and was operating a vehicle either owned or leased by Concor on the Baltimore Washington Parkway Interstate 295 in the state of Maryland.

JURISDICTION AND VENUE

4. Pursuant to U.S.C. 1332 (a) (1) this court has original jurisdiction over this action because the plaintiff and the defendants are citizens of different states and the amount in controversy exceeds \$75,000.00.
5. Plaintiff George Harrison is a citizen of the state of Maryland. Defendant Matthew is a citizen of the state of Maine. Concor Networks is a company located in Illinois. Venue is proper because the cause of action arose on a federal highway located in this judicial district. All facts giving rise to this matter took place within the state of Maryland.

STATEMENT OF FACTS

6. On April 08, 2019, the plaintiff was operating his vehicle southbound on the Baltimore Washington Parkway in heavy stop and go traffic.
7. While doing so, a vehicle operated by the defendant violently struck the vehicle operated by Jonathan Phipps either owned and or leased by defendant Concor Networks. The force of that collision caused the Concor Network vehicle to next strike plaintiff's vehicle in the rear causing the plaintiff to sustain injuries.

PLAINTIFF'S CAUSE OF ACTION: NEGLIGENCE

8. Plaintiff re-alleges each and every allegation in ¶¶ 1-6 as if set forth at length herein.
9. Defendants owed a duty of care to the plaintiff in the operation of their respective vehicles and to further drive carefully and attentively given that traffic conditions were quite heavy and congested when the accident occurred.
10. Defendants breached that duty of care by operating their vehicles in such a manner that the collision caused the plaintiff's vehicle to be struck in the rear. In so doing the defendants breached the standard of care warranted and required under the circumstances, and thus the defendants were negligent and careless.
11. Defendants' negligence and carelessness was the direct and proximate cause of the automobile accident that occurred which caused the plaintiff to sustain serious and permanent injuries for which he seeks damages. As a consequence of the negligence of the defendants, the plaintiff sustained damages, has received medical care and may have to require future medical care and expenses, has and will suffer pain and mental anguish and further suffered an enjoyment of life for which he seeks damages.

RELIEF SOUGHT

Plaintiff seeks the following by way of relief and remedy:

1. Compensatory damages caused by the actions of the defendant as stated herein and according to proof as allowed under applicable law in the amount of \$250,000;

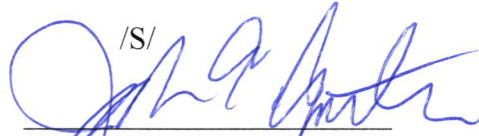
2. All other relief this Court deems just, proper and appropriate,
including but not limited to costs of suit.

JURY DEMAND

Plaintiff requests a trial by jury as to all issues pleaded.

Respectfully submitted,

4/09/22

/S/ 

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Attorney for Plaintiff George
Harrison